

UNITED STATES DISTRICT COURT
District of Minnesota

UNITED STATES OF AMERICA,

INDICTMENT *CR 15-102 RHK/TNL*

Plaintiff,

18 U.S.C. § 2252(a)(1)
18 U.S.C. § 2252(a)(4)(B)
18 U.S.C. § 2252(b)(1)
18 U.S.C. § 2252(b)(2)
18 U.S.C. § 2253(a)

v.

KEITH MICHAEL NOVAK,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interstate Transportation of Child Pornography)

On a date unknown but between on or about July 17, 2012 and October 30, 2012, in the State and District of Minnesota and elsewhere, the defendant,

KEITH MICHAEL NOVAK,

did knowingly transport visual depictions using a means and facility of interstate commerce and in and affecting interstate commerce, by any means including by computer and mail, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: the following computer image files:

- a) 1286059727702.jpg; and
- b) 1287080338062.jpg;

all in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

SCANNED

APR 08 2015

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COUNT 2
(Possession of Child Pornography)

On or about December 11, 2013, in the State and District of Minnesota, the defendant,

KEITH MICHAEL NOVAK,

did knowingly possess one or more matters which contained visual depictions that had been shipped and transported using a means and facility of interstate commerce, including by computer, and had been mailed, shipped and transported in and affecting interstate commerce, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer image files:

- c) 1291776800182.jpg;
- d) 1301116433584.jpg; and
- e) 1301116576535.jpg;

all in violation of Title 18, United State Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

Counts 1 and 2 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of any of the foregoing offenses, the defendant,

KEITH MICHAEL NOVAK,

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shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The property subject to forfeiture includes, but is not limited to: one Dell laptop, serial number unknown, one Seagate hard drive, serial number 5VJ1ZZN2, and one Western Digital external hard drive, serial number unknown.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(1), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

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A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON